

### REMARKS

In this Amendment, Applicant has cancelled Claims 2 and 16, without prejudice and disclaimer, and amended Claims 1, 3 – 15 and 17 – 19. Claims 1, 3, 6, 8, 10, 11, 12, 13 17 and 18 have been amended to overcome the rejections and further specify the embodiments of the present invention. Claims 4, 5, 7, 9, 14, 15 and 19 have been amended to proper dependent format. It is respectfully submitted that no new matter has been introduced by the amended claims. All claims are now present for examination and favorable reconsideration is respectfully requested in view of the preceding amendments and the following comments.

### CLAIM OBJECTIONS:

Claim 14 has been objected as containing informalities. Applicant respectfully submits that the informalities have been corrected. In particular, period “.” has been added at the end of the sentence.

### REJECTIONS UNDER 35 U.S.C. § 102:

Claims 1 – 19 have been rejected under 35 U.S.C. § 102 (b) as allegedly being anticipated by Yamada et al. (EP 0 614 324), hereinafter Yamada.

Applicant traverses the rejection and respectfully submits that the present-claimed invention is not anticipated by the cited reference. At first, Claims 2 and 16 are cancelled, without prejudice and disclaimer. The rejections to Claims 2 and 16 are moot. In addition, it is respectfully submitted that independent Claims 1 and 17 have been amended to further specify the embodiments of the present invention. In particular, the amended claim 1 comprises three major sets of components -- interfaces on both sides, TDM and packet buses, and bi-directional conversion between the buses. Each interface receives its relevant format signals from a bus and places signals of this format on the

bus. This architecture allows excellent versatility because capacity at the interface or conversion levels can be easily added, deleted, or modified. To add a new circuit it is only necessary to "hook it up" to the bus, or to disconnect it to delete it. The conversion unit which performs the processing can be configured in whichever way is desirable in a modular manner.

It is respectfully submitted that the embodiment of the presently claimed invention is a radical departure from Yamada. What disclosed in Yamada is fixed and non-modular in nature. According to Yamada, there is a fixed left-to-right ATM-TDM chain of components 5, 6, 7, 1, 2, 10, and 11 is for uni-directional conversion of ATM to TDM. The highway 5 is simply a conductor for incoming ATM cells, and the highway 11 for output of TDM signals. These are not buses as understood by a person of ordinary skills in the art. It is respectfully submitted that these components disclosed in Yamada are the equivalents of input conductors feeding the packet interfaces or conductors delivering signals from the TDM interfaces, but not all the elements as required in the embodiments of presently amended claims.

In addition, for conversion in the opposite direction, Yamada provides a separate dedicated chain of components shown in Fig. 9, with TDM data being received at a TDM highway 95 and being processed by circuits 96, 97, 91, 92, 98 and being delivered on an output highway 99. Therefore, Yamada teaches away from the present invention by teaching use of separate dedicated single-direction fixed circuits. On the other hand, the embodiment of the presently claimed invention provides a universal architecture allowing excellent versatility both in processing capacity scalability and in nature of conversion. These advantages arise because of the use of buses, each for bi-directionally receiving and transmitting signals from/to an interface on one side and a conversion means on the other. The two buses together allow any desired number and type of format conversion units between the buses. Another major advantage of the present invention is its simplicity.

Regarding claim 17, it is respectfully submitted that the amended claim 17 comprises the features of the bi-directional TDM and ATM interfaces, TDM and ATM buses, and a service-specific adaptation module between the buses. As stated above, Yamada does not disclose these features, such as the bi-directional interface and bus features. In addition, Claim 17 comprises a service-specific adaptation module, which allows the deployment of services in operation by simply "hooking up" an adaptation module between the buses in a modular manner.

In summary, the newly presented claims are not anticipated by Yamada and the rejection under 35 U.S.C. § 102 (b) has been overcome. Accordingly, withdrawal of the rejections under 35 U.S.C. § 102 (b) is respectfully requested.

REQUEST FOR INTERVIEW

Applicant respectfully requests either a telephonic or an in-person interview should the applicant as presently amended not be in condition for allowance.

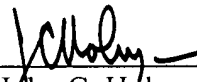
Having overcome all outstanding grounds of rejection, the application is now in condition for allowance, and prompt action toward that end is respectfully solicited.

Respectfully submitted,

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